

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

SHATHA AL-RUBAYE,

Plaintiff,

v

STATE FARM MUTUAL AUTOMOBILE
INSURANCE COMPANY, ROLANDO
PAULINO BARTOLOME, and NEWPORT
LEASING LTD,

Defendants.

Civil Case No. 2:20-cv-12638

Hon. Terrence G. Berg

Hon Mag. Anthony P. Patti

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**QUALIFIED PROTECTIVE ORDER ALLOWING DEFENSE COUNSEL FOR ROLANDO
PAULINO BARTOLOME AND NEWPORT LEASING LTD TO CONDUCT *EX-PARTE*
INTERVIEWS WITH PLAINTIFF'S HEALTHCARE PROVIDERS**

IT IS HEREBY ORDERED that defense counsel for ROLANDO PAULINO BARTOLOME
and NEWPORT LEASING LTD may conduct ex-parte interviews with Plaintiff's healthcare
providers.

IT IS FURTHER ORDERED that all *ex-parte* interviews shall be in regard to this litigation, and any healthcare provider, like any witness, is not required to participate in an *ex-parte* interview, and must be told such upon the request for the interview.

IT IS FURTHER ORDERED that if said Defendants or their counsel obtain any protected health information as a result of *ex-parte* communications with any of Plaintiff's healthcare providers, defendants are prohibited from using or disclosing that protected health information for any purpose other than this litigation.

IT IS FURTHER ORDERED that any protected health information obtained through the *ex-parte* communications shall be destroyed at the conclusion of this litigation.

IT IS FURTHER ORDERED that this Order is entered pursuant to the HIPAA Privacy Regulation 45 CFR §164.512(e)(1)(i) to permit *ex-parte* interviews between counsel for said defense and Plaintiff's healthcare providers, and shall remain in effect through the duration of this litigation.

IT IS FURTHER ORDERED that said Defendants shall serve a copy of this Order on any treating physician prior to any *ex parte* meetings.

This is **not** a final order.

/s/Terrence G. Berg
TERRENCE G. BERG
UNITED STATES DISTRICT COURT JUDGE

Dated: February 10, 2021

Stipulated as to form and content:

/S/ VICTOR McCOY (w/ consent)
VICTOR McCOY (P51315)
Attorney for Plaintiff

/S/ TIMOTHY S. GROUSTRA
TIMOTHY S. GROUSTRA (P48966)
Attorney for Defendants Bartolome/Newport